

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Curtis Clark,

Plaintiff,

v.

Deborah Parker, et al.,

Defendants.

CASE NO. 5:24-CV-01312-CEF

Judge Charles Esque Fleming

Magistrate Judge

Jonathan D. Greenberg

**JOINT RULE 26(f) REPORT AND
PROPOSED DISCOVERY PLAN**

Pursuant to Fed. R. Civ. P. 26(f), this Court's Local Rules, and this Court's Order of February 14, 2025, the undersigned parties conferred on February 20, 2025, and prepared the following report. A telephone status conference is set for April 4, 2025, at 11:00AM, before United States Magistrate Judge Jonathan D. Greenberg, by telephone.

1. Proposed Amendments to the Pleadings

The parties do not anticipate filing amendments to the pleadings.

2. Proposed Discovery Management Plan

The parties agree that this case does not fit the criteria for either expedited, complex, administrative, or mass tort and should remain on a standard track pursuant to Local Rule 16.2. The parties anticipate in engaging in all traditional forms of discovery, including written discovery, depositions of parties/witnesses, subpoenas

duces tecum to obtain records from non-party witnesses, and the possible retention of expert witnesses. The parties do not anticipate exceeding more than eight fact witness depositions, and do not expect any deposition to exceed seven hours in one day. The parties agree to limit interrogatories to twenty-five per party, including sub-parts.

PROPOSED DISCOVERY PLAN

The parties request six (6) months of fact discovery and propose the following discovery plan:

Event/Deadline	Proposed Date
Fed. R. Civ. P. 26(a)(1) Initial Disclosures	March 7, 2025
Fact Discovery Cutoff	August 22, 2025
Expert Witness Disclosures/Report by Plaintiff, if any	September 22, 2025
Expert Witness Disclosures/Report by Defendant, if any	October 22, 2025
Dispositive Motions & Motions to Limit/Exclude Expert Testimony	November 21, 2025
All Other Motions, Including Motions in Limine	TBD by Court
Settlement Conference	TBD by Court
Joint Final Pretrial Order, including listing all witnesses to be called at trial	TBD by Court

Final Pretrial Conference	TBD by Court
Trial	TBD by Court
Estimated Length of Trial	3 Days

3. Electronically Stored Information (“ESI”)

The parties do not anticipate that the claims or defenses in this case will involve extensive ESI. The parties agree to follow the default standard for discovery of ESI (Appendix K to the Local Rules for the Northern District of Ohio).

4. Settlement and ADR

The parties have engaged in informal settlement discussions but have not gone beyond the initial discussions. The parties believe a mediation may be useful after the close of fact discovery.

5. Consent

The parties do not agree to jurisdiction of a United States Magistrate Judge.

6. Trial

Trial will be by jury. The parties estimate the trial will last approximately 3 days.

7. Miscellaneous

The parties do not have anything further to discuss with the Court at this time.

Respectfully submitted,

/s/ Colin G. Meeker (per email consent 2/20/2025)

Colin G. Meeker

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Dated: February 21, 2025

CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2025, a copy of the foregoing was transmitted to the Clerk's Office using CM/ECF System for filing. Notice of this filing will be sent via operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Robert J. Kolansky
Robert J. Kolansky